## Federal Defenders OF NEW YORK, INC.

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November 15, 2015

Honorable Edgardo Ramos United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007 The status conference is adjourned to Dec. 1, 2015, at 11:00 am. Speedy trial time is excluded from Nov. 17, 2015, until Dec. 1, 2015, in the interest of justice.

The application is **y** granted

denied

Re: United States v. El Gammal 15 Cr. 588 (ER)

Hon. Judge Ramos,

Edgardo Ramos, U.S.D.J

Dated: <u>11/16/2015</u> New York, New York

I write to request a ten-day adjournment of the November 17, 2015, status conference on the above case. Discovery was produced on a rolling basis and we are still reviewing it.

To that end, we request that the time between November 17, 2015, and the next court date decided by the Court, be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161(h)(7)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial, because it will allow the government and defense counsel to continue discussions regarding a possible disposition in the matter.

Thank you for your consideration of our request.

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DATE FILED: 11/16/2015

Respectfully submitted,

Sabrina P. Shroff & Annalisa Miron Assistant Federal Defenders

cc: AUSAs Surratt & Quigley (via email)
 Mr. Ahmed M. El Gammal, (via mail)